

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:23-CR-380
)	
SONNY SAGGAR, M.D., and)	
RENITA BARRINGER,)	
)	
Defendants.)	

**DEFENDANTS SAGGAR AND BARRINGER'S
UNOPPOSED MOTION TO SET DEADLINE FOR PRETRIAL MOTION**

Come now Defendants, through undersigned counsel, and respectfully move the Court to set a deadline for pretrial motions that is two weeks after the Government completes its Rule 16 discovery disclosures. In support of this motion, the Defendants state as follows:

Defendants were arrested on July 27, 2023. The Government produced its first production of Rule 16 discovery on August 10, 2023. Then, on August 14, 2023, the Government notified defense counsel regarding its view of the timing of the remaining production schedule:

the USAO is processing one of the computers that FBI seized. Due to the size of the file, we anticipate being able to produce it to you by September 7. Ms. Barringer's laptop was also seized. Later this week, I anticipate having a timeframe for production of that information as well.

After we get through the above, we will turn to the remaining devices: a CPU, several CDs, and a couple of thumb drives.

In other words, it is likely that Defendants may not have all the discovery to which they are entitled until much later. Much of the discovery that has yet to be produced was obtained from search warrants, which may or may not be subject to possible challenge.

Defense counsel believes appropriate decisions on what, if any, pretrial motions to file cannot be made without knowing the extent and nature of all the Rule 16 discovery. If acceptable to the Court, defense counsel and the Government have agreed to seek a deadline for filing pretrial motion of November 6, 2023.¹

Wherefore, Defendants request the Court to set November 6, 2023, as the deadline for pretrial motions.

Dated: August 16, 2023

Respectfully submitted,

DOWD BENNETT LLP

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¹ The parties are hopeful discovery will be completed at that time, but should not be the case, defense counsel may seek a further extension.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 16, 2023, a copy of the foregoing was filed electronically via this Court's CM/ECF system, and therefore served on all parties of record.

/s/ James G. Martin
James G. Martin